

Remarks:

Claims 1 and 3-8 remain in this case. In the subject Office Action, the Examiner rejected claims 1-6 under 35 U.S.C. §102(b) as anticipated by Watts and claim 7 under 35 U.S.C. §103(a) as obvious over Watts in view of McWhorter. Claim 2 has been cancelled, claim 1 amended to include the subject matter of cancelled claim 2, and claim 8 added to further define the invention.

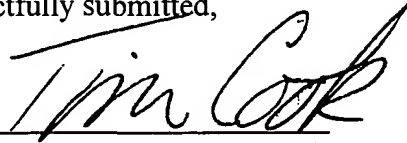
Watts teaches a pillar insert 34, as shown in Figure 3 and described in Column 4, lines 30-52. The pillar insert 34 includes top plate 44, bottom plate 46 and spacer pin 48. Top plate 44 and bottom plate 46 are substantially triangular in shape with holes 50 and 52 substantially centrally positioned, respectively, to receive spacer pin 48. Spacer pin 48 has reduced diameter end sections 54 and 56 to mate with holes 50 and 52, respectively. As shown in this preferred embodiment, top plate 44 and bottom plate 46 *are free to rotate* on spacer pin 48. Thus, as seen in FIG. 2, the assemblies of top plates 44 and bottom plates 46 are arranged to form a semi-circular steel arcs similar to that of an "iris" shutter of a camera that acts to prevent extrusion of the elastomeric material of packer member 32 in use.

The present invention, in contrast, operates on a different principal. The top and bottom plates of the present invention do not rotate with respect to one another, as best seen in Figure 3. The rib between the top and bottom plates defines a non-circular cross section and slides into either the top plate or the bottom plate, and remains free to slide axially, but not in rotation related to the plate. This is so that, under pressure, the wedge-shaped segments will slide only radially inwardly, and not as an "iris" shutter, as taught in Watts.

Claim 8 has been added to clarify that the recess to receive the rib may be in the upper plate, and not necessarily in the bottom plate, as in claim 1 as amended.

The applicants respectfully assert that all claims are now in condition for allowance and respectfully request early allowance. No additional fee is required.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tim Cook", written over a horizontal line.

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